

# EXHIBIT O

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

CUNG LE; NATHAN QUARRY, JON )  
FITCH, on behalf of )  
themselves and all others )  
similarly situated, )  
 )  
Plaintiffs, )  
 )  
vs. ) Case No.  
 ) 2:15-cv-01045-RFB-(PAL)  
 )  
ZUFFA, LLC, d/b/a Ultimate )  
Fighting Championship and )  
UFC, )  
 )  
Defendant. )  
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CONFIDENTIAL

VIDEO RECORDED 30(b) (6) DEPOSITION OF ZUFFA, LLC

BY IKE LAWRENCE EPSTEIN

December 2, 2016

LAS VEGAS, NEVADA

11:29 A.M.

Reported by:  
Sarah Padilla, CCR NO. 929  
Job No: 47777

IKE LAWRENCE EPSTEIN - CONFIDENTIAL

	86		88
1	including the portion not specified in the purchase	1	THE VIDEOGRAPHER: We are back on the
2	agreement, was a non-compete component to be	2	record at 2:05. And this marks the beginning of
3	classified as non-compete assets."	3	Media No. 3 of the deposition of Lawrence Epstein.
4	Do you see where it says that?	4	BY MR. WEILER:
5	A Yup.	5	<b>Q Did Zuffa acquire an MMA promoter known as</b>
6	<b>Q Is that accurate?</b>	6	<b>Pride?</b>
7	<b>MS. GRIGSBY: Objection. Again, it's</b>	7	A Yes.
8	actually -- that's not quite what that sentence	8	<b>Q How did Zuffa come to purchase Pride?</b>
9	says.	9	A It is a long, long story. To summarize,
10	THE WITNESS: Yeah. I don't know. I'm	10	it actually started years before the deal was done
11	not an accountant. I'm not a tax expert. This	11	when Pride was the largest mixed martial arts
12	looks like it's talking about allocation of a	12	promoter in the world. They had actually approached
13	purchase price over a period of years. And I'm just	13	the UFC -- which had fairly recently been bought by
14	not expert to answer that type of a question. So I	14	Frank and Lorenzo Fertitta -- about acquiring the
15	don't know whether it's accurate or not.	15	UFC or potentially acquiring the right to stage UFC
16	BY MR. WEILER:	16	branded events in Japan and other Asian markets.
17	<b>Q Okay. And directing your attention to the</b>	17	These discussions when on for some period
18	<b>second sentence of this paragraph, it says, "The</b>	18	of time. And at some point during those
19	<b>reason for the acquisition was to control the WFA</b>	19	negotiations, I actually went with the Fertittas,
20	<b>brand and prevent it from competing with the WEC and</b>	20	Dana White to an event in Japan where we watched
21	<b>UFC."</b>	21	Chuck Liddell, who was one of the UFC fighters,
22	<b>Do you see where it says that?</b>	22	fight in a private event. I think that was 2003,
23	A I do.	23	but I could be wrong about that. We had a lot of
24	<b>Q Is that accurate?</b>	24	discussions with them on that trip. I don't know if
25	A No.	25	you've ever been involved with negotiations with
	87		89
1	<b>Q And what's inaccurate about that</b>	1	Japanese businesses, but it's very challenging.
2	<b>statement?</b>	2	It's a very different negotiating style than what we
3	A The entire thing. That's not the reason	3	have here in the United States. So nothing really
4	for the acquisition of the WFA brand. I mean, is it	4	happened.
5	a small, little known brand or is it a competitor?	5	After some period of time, Pride began to
6	You've got two different characterizations in two	6	have some serious financial issues. It really
7	different paragraphs in the same page.	7	started with them being noted in a Japanese
8	The WFA was brought to us by Louis Palazzo	8	publication as having connections with the Yakuza,
9	and Ross Goodman. They put on one or two events.	9	which is Japanese organized crime. These
10	<b>The business was failing because they couldn't</b>	10	publications in -- in a fairly well-circulated
11	<b>manage it properly, I assume.</b> And they wanted to	11	magazine in Japan resulted in them losing their
12	get out of the business. They sold -- they sold	12	television distribution deal with Fuji TV. Which
13	some tapes and some fighter contracts and their	13	was very important to them, both from a monetary
14	brand. That's what happened. This was not some	14	standpoint and from a general exposure standpoint.
15	grand scheme to take them out of the market.	15	And their business began to really falter.
16	<b>Q And so --</b>	16	At that point, we had heard -- this is
17	A They took themselves out of the market.	17	probably in early 2006 or mid-2006 -- that they were
18	<b>Q So Zuffa had no intention of taking WFA</b>	18	thinking about selling the business because they
19	<b>out of the market?</b>	19	were in financial difficulty. And once again, we
20	A No.	20	began negotiating with them. These negotiations
21	<b>Q Go ahead.</b>	21	took months and months and months. There were
22	THE VIDEOGRAPHER: This marks the end of	22	our -- our understanding there were other bidders
23	the Media No. 2 of the deposition of Lawrence	23	involved in the process. We ultimately reached a
24	Epstein. We are off the record at 1:56.	24	deal sometime in, you know, second quarter of 2007
25	(A brief recess was taken.)	25	to buy the company. So it is truly something that

23 (Pages 86 to 89)